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March 7, 2008

By E-Mail To All Counsel

Ira S. Sacks, Esq.
Dreier LLP
499 Park Avenue
New York, NY 10022

Re: *GMA Accessories, Inc. adv. Sanei Charlotte Ronson LLC*, 07-CV-9578 (CM)
GMA Accessories, Inc. v. Eminent, Inc., et al., 07-CV-3219 (LTS)

Dear Mr. Sacks:

Please let me know when you are available to meet and confer regarding the following disputes:

1. We have yet to receive, despite several reminders, your document production in the Sanei matter. Also, you have not quantified your damages as required by Rule 26(a)(1).

2. In a letter dated February 26, 2008, you requested additional information from GMA. It is my understanding that, on February 10, 2008, pursuant to Judge Freeman's February 7th directives, Crystal Scott of our office had a meet and confer with Robert Grand of your office¹. Ms. Scott clarified her letters of January 14 and February 6, i.e. that sales orders and shipping documents are assembled and ready for your inspection in New Jersey and that everything else was delivered to you. From my review of the file and your February 26th letter, it appears that while Mr. Grand was satisfied with the results of that meet and confer, you are not.

I believe that when we meet and confer telephonically, we will be able to address and hopefully resolve these discovery issues. Would you be available at any time on Monday March 10th?

Very truly yours,


Ronald I. Paltrowitz

¹ Pursuant to letters dated February 5, 6, and 7, I see that Mr. Grand objected to this firm's request that other attorneys from your firm be present at the meet and confer.